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16 **UNITED STATES BANKRUPTCY COURT**
17 **DISTRICT OF NEVADA**

18 In re: Case No.: BK-S-16-15388-mkn
19 SUPERIOR LINEN, LLC, Chapter 11
20 Debtor. Date: OST PENDING
21 Time: OST PENDING

22 ***EX PARTE APPLICATION FOR ORDER SHORTENING***
23 ***TIME TO HEAR DEBTOR'S SECOND MOTION FOR AN ORDER:***

24 ***(I) AUTHORIZING SUPERPRIORITY POST-PETITION FINANCING;***
(II) GRANTING LIENS AND PROVIDING SUPERPRIORITY ADMINISTRATIVE
EXPENSE CLAIMS; (III) APPROVING LOAN DOCUMENTS RELATING TO
THE FOREGOING; (IV) GRANTING RELIEF FROM THE AUTOMATIC
STAY; AND (V) GRANTING OTHER RELATED RELIEF

25 Superior Linen, LLC, a Nevada limited liability company, as debtor and debtor in
26 possession (the “Debtor”), hereby submits its application (the “Application”) for an order
27 shortening time to hear the *Debtor's Second Motion for an Order: (I) Authorizing Superpriority*
28 *Post-Petition Financing; et al.* (the “Motion”). This Application is made and based on the points
and authorities herein, the *Declaration of Matthew C. Zirzow, Esq.* (the “Zirzow Declaration”)
included herein, the *Attorney Information Sheet* filed contemporaneously herewith, and the papers
and pleading on file herein, judicial notice of which is respectfully requested.

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**Declaration of Matthew C. Zirzow, Esq. in Support of
Ex Parte Application for Order Shortening Time**

I, Matthew C. Zirzow, Esq., declare as follows:

1. I am over the age of 18, am mentally competent, have personal knowledge of the facts in this matter, and if called upon to testify, could and would do so. I am a shareholder with the law firm of Larson & Zirzow, LLC, attorneys for the Debtor in the above captioned bankruptcy case, and duly licensed to practice law in the State of Nevada.

2. Debtor is a full service commercial laundry company providing the entire spectrum of laundry services to hotels and food and beverage managed restaurants and clubs. Founded in 2010, Superior Linen is one of the leading commercial laundry and linen rental companies in Las Vegas operating in a 105,000 square foot mega plant in North Las Vegas.

3. The Debtor is requesting that the Motion be heard on shortened time as necessary to the ongoing operation of the company post-petition, and to preserve and protect the Debtor's assets for the benefit of its creditors and the estate. The Debtor is in emergency need of additional funds to continue the operation of its business and sustain operations. Failure to receive these funds will be detrimental to the continued operation of the company, and may be cause and impairment that the company may not be able to recover. The financing will ensure that the Debtor can continue necessary operations that will be advantageous in the reorganization efforts of the Debtor through March 2017. Specifically, the Debtor is requesting that the Motion be heard by no later than Friday, January 27, 2017. Additional reasons and explanation for the relief requested is supported by the separate declaration of Robert Smith [ECF No. 209].

4. Counsel anticipates that the hearing on the Motion will take no more than twenty (20) minutes of hearing time.

DATED: January 23, 2017.

/s/ Matthew C. Zirzow
MATTHEW C. ZIRZOW, ESQ.

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2 **Legal Argument**
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4 11 U.S.C. § 105(a) allows this Court to issue such orders as are necessary to carry out the
5 provisions of this title. Fed. R. Bankr. P. 9006(c)(1) permits a Bankruptcy Court, for cause shown
6 and in its discretion, to reduce the period during which any notice is given in accordance with the
7 Bankruptcy Rules. In particular, this Rule provides as follows: “when an act is required or allowed
8 to be done at or within a specified time by these rules or by a notice given thereunder or by order
9 of court, the court for cause shown may in its discretion with or without motion or notice order the
10 period reduced.” Fed. R. Bankr. P. 9006(c). Local Rule 9006 provides further authority for
11 shortening the time for a hearing. According to Local Rule 9006(b), every motion for an order
12 shortening time must be accompanied by an affidavit stating the reasons for an expedited hearing.
13 As set forth in the Zirzow Declaration, there are compelling reasons for an expedited hearing on
14 the Motion. Local Rule 9006 also requires the moving party to submit an Attorney Information
15 Sheet indicating whether opposing counsel was provided with notice, whether opposing counsel
16 consented to the hearing on an order shortening time, the date counsel was provided with notice
17 and how notice was provided or attempted to be provided. An Attorney Information Sheet was
18 filed contemporaneously with this Application, and all counsel have consented.

19 **Conclusion**
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21 WHEREFORE, the Debtor respectfully requests that this Court grant this Application and
22 issue an order shortening time to hear the Motion **by no later than Friday, January 27, 2017**. The
23 Debtor also requests such other and further relief as is just and proper.

24 DATED: January 23, 2017.
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26 LARSON & ZIRZOW, LLC
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28 By: /s/ Matthew C. Zirzow
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